

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

MARY SEGUIN,

*Plaintiff,*

VS.

Civil Action No. 1:23-cv-00034

RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES in its official capacity; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS and TIMOTHY FLYNN in their individual and official capacities; GERO MEYERSIEK,

*Defendants*

**PLAINTIFF'S NOTICE OF AFFIDAVIT IN SUPPORT OF PLAINTIFF'S INTENDED RULE 11 MOTION  
FOR SANCTIONS AGAINST DEFENDANTS**

Pursuant to Fed. Civ. R. P. 11, the Plaintiff hereby gives defendants notice of Plaintiff's Affidavit in support of Plaintiff's Rule 11 Motion for Sanctions that Plaintiff gave notice (ECF 21) of her intent to file against defendants Rhode Island Office of Child Support Services, Kevin Tighe, Monique Bonin, Frank DiBiase, Wendy Fobert, Karla Caballeros, and Timothy Flynn, for filing the Motion for Extension of Time (ECF 15) that has no reasonable factual basis, is based on a legal theory that has no reasonable chance of success and that cannot be advanced as a reasonable argument to change existing law; and is filed in bad faith for an improper purpose.

Respectfully submitted,

March 6, 2023

FOR PLAINTIFF  
MARY SEGUIN, Pro Se.

By: Mary Seguin  
Mary Seguin  
P.O. Box 22022  
Houston, TX 77019  
maryseguin22022@gmail.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 6, 2023, I filed the within Notice via the ECF filing system and that a copy is available for viewing and downloading.

*Mary Seguin*

---

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

MARY SEGUIN,

*Plaintiff,*

VS.

Civil Action No. 1:23-cv-00034

RHODE ISLAND OFFICE OF CHILD SUPPORT SERVICES in its official capacity; KEVIN TIGHE, MONIQUE BONIN, FRANK DIBIASE, WENDY FOBERT, KARLA CABALLEROS and TIMOTHY FLYNN in their individual and official capacities; GERO MEYERSIEK,

*Defendants*

**PLAINTIFF'S AFFIDAVIT IN SUPPORT OF PLAINTIFF'S RULE 11 MOTION FOR SANCTIONS  
AGAINST DEFENDANTS**

I, MARY SEGUIN, hereby declares under penalty of perjury, pursuant to 28 U.S.C. sec. 1746(2) that the following statements are true and correct:

1. On March 6, 2023, at 2:30PM a hearing was held via WebEx in Rhode Island Family Court in the matter **State of Rhode Island ex rel. Gero Meyersiek v. Mary Seguin K-20010521M**, that defendants refer to in their Motion for Extension of Time (ECF 15).
2. The family court presiding justice decreed that, at the hearing of February 10, 2023, the family court:
  - a. did not make any findings of fact;
  - b. did not make any findings on whether Seguin owed any amount of child support interest;
  - c. ordered the interest put back on the system, without prejudice to Seguin, for the purpose of having a starting point to go on, and had continued the matter in family court until June 8, 2023 in order to allow for discovery to proceed forthwith so that Rhode Island Office of Child Support Services ("RI OCSS") has to produce the documents Seguin requested.

- d. The family court further decreed that there will be subsequent hearings to determine whether the interest the State put back on the system is accurate or not;
- e. The family court decreed the State has to send Seguin documents that substantiate the interest number the State put back on the system.
- f. The family court decreed it only took judicial notice that there was no appeal by Seguin of the 2012 Family Court order.
- g. The family court decreed the State has the burden to substantiate that the amount that the RI OCSS put back on the system is accurate and owed.
- h. RI OCSS told the family court that it withholds documents and refuses to produce documents, pursuant to Seguin's propounded Rule 34 document requests for interest waiver and interest forgiveness documents, based on procedural and legal grounds.
- i. The family court told RI OCSS that it will have to bring up RI OCSS's reasons for refusing to produce interest waiver and forgiveness documents requested by Seguin on June 8, 2023, the date the hearing there is continued.

Respectfully submitted,

Date: March 6, 2023

MARY SEGUIN

A handwritten signature in cursive script that reads "Mary Seguin". The signature is written in black ink and is positioned above a horizontal line.

Mary Seguin

P.O. Box 22022

Houston, TX 77019

[maryseguin22022@gmail.com](mailto:maryseguin22022@gmail.com)